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 CONTRA COSTA COUNTY, ET AL.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CLARK WALKER,
 Plaintiff,

v.

CONTRA COSTA COUNTY, KEITH
 RICHTER, and RICHARD GRACE,
 Defendants.

AND RELATED CASE.

NOS. C05-2800 TEH
 C03-3723 TEH

**STIPULATION AND ~~PROPOSED~~
 ORDER TO ENLARGE EXPERT
 WITNESS DISCOVERY CUT-OFF**

1 1. Plaintiff CLARK WALKER (“Chief Walker”) and Defendants CONTRA
2 COSTA COUNTY, KEITH RICHTER, and RICHARD GRACE, by and through their respective
3 counsel, jointly apply for an Order, pursuant to Civil Local Rule 6-2, to enlarge expert witness
4 discovery cut-off from October 24, 2006 to November 10, 2006 for the sole purpose of taking the
5 depositions of Dr. Mark D. Nathan and Ronn Coleman.

6 2. The parties have been diligent in conducting expert witness discovery. In the
7 first action, Plaintiff disclosed five (5) expert witnesses and one rebuttal expert witness, who have
8 all been deposed by Defendants. Defendants disclosed also disclosed five (5) expert witnesses, one
9 of whom was Ronn Coleman. Defendants subsequently withdrew one expert. Plaintiff has deposed
10 the remaining four (4) expert witnesses. Plaintiff deposed Mr. Coleman on January 6, 2006.

11 3. In the related case, Plaintiff disclosed but withdrew one (1) expert witness.
12 On September 28, 2006, Defendants disclosed three (3) expert witnesses, one of whom was
13 disclosed by Plaintiff in the first action. Ronn Coleman was disclosed again in the related case. On
14 October 20, 2006, Defendants served expert witness reports of Dr. Nathan and Ronn Coleman.

15 4. Good cause exists to enlarge the date to expert witness discovery cut-off,
16 because defense counsel has confirmed that neither Dr. Nathan or Ronn Coleman are available prior
17 to expert witness discovery dut-off on October 24, 2006. The parties request an extension of time to
18 permit Plaintiff to depose Dr. Nathan and Ronn Coleman based on their expert reports served on
19 October 20, 2006. The parties are continuing to meet and confer regarding the deposition dates.

20 5. Therefore, the parties respectfully request that expert witness discovery cut-
21 off be enlarged from October 24, 2006 to November 10, 2006, solely to permit Plaintiff to depose
22 Dr. Nathan and Ronn Coleman.

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1 DATED: October 24, 2006

PRICE AND ASSOCIATES

2
3 /s/

4 _____
5 OK-HEE SHIM, Attorneys for
6 Plaintiff CLARK WALKER

7 DATED: October 24, 2006

SILVANO B. MARCHESI, County Counsel

8
9 /s/

10 _____
11 BERNARD L. KNAPP, Deputy County Counsel,
12 Attorneys for Defendants CONTRA COSTA
13 COUNTY, KEITH RICHTER, and RICHARD
14 GRACE

15 **ORDER**

16 Pursuant to the foregoing Stipulation and good cause appearing therefor, **IT IS**
17 **HEREBY ORDERED** that expert witness discovery cut-off for the sole purpose of taking the
18 depositions of Dr. Nathan and Ronn Coleman be enlarged from October 24, 2006 to November 10,
19 2006. NO OTHER TRIAL OR PRETRIAL DEADLINES OR DATES SHALL BE MODIFIED
20 OR CHANGED AS A RESULT OF THIS ORDER.

21 Date: _____

22 _____
23 HONORABLE THELTON E. HENDERSON
24 UNITED STATES DISTRICT JUDGE

